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09/21/2023

Ord Transfer P/Judge for Assn

Cause assigned to Division # 02 for trial on 11/27/23. see court order So Ordered: Elizabeth B. Hogan, Judge

Jury Trial Scheduled

Scheduled For: 11/27/2023; 9:00 AM; CLINTON ROBERT WRIGHT; City of St. Louis

Hearing/Trial Cancelled

Associated Entries: 08/28/2023 - Jury Trial Scheduled

Scheduled For: 11/27/2023; 9:00 AM; ELIZABETH BYRNE HOGAN; City of St. Louis

Judge Assigned

09/12/2023

Corporation Served

Document ID - 23-SMCC-10059; Served To - WASHINGTON UNIVERSITY IN ST. LOUIS; Server - ; Served Date - 12-SEP-23; Served Time - 00:00:00; Service Type - Other; Reason Description - Served

Notice of Service

Proof of Service.

Filed By: MATTHEW JOHN GHIO

On Behalf Of: SOPHIA VASSER

09/08/2023

Alias Summons Issued

Document ID: 23-SMCC-10059, for WASHINGTON UNIVERSITY IN ST. LOUIS.

09/06/2023

Motion Special Process Server

Request for Appointment of Process Server.

Filed By: MATTHEW JOHN GHIO

On Behalf Of: SOPHIA VASSER

Alias Summons Requested

Request for Alias Summons.

Filed By: MATTHEW JOHN GHIO

On Behalf Of: SOPHIA VASSER

Order

Plaintiff's Motion for Leave to File First Amended Petition Under Rule 55.33(a) is hereby granted. So Ordered: Judge Michael Stelzer #40716

Notice of Hearing Filed

Notice of Hearing.

Filed By: MATTHEW JOHN GHIO

On Behalf Of: SOPHIA VASSER

08/28/2023

Jury Trial Scheduled

Associated Entries: 09/21/2023 - Hearing/Trial Cancelled

Scheduled For: 11/27/2023; 9:00 AM; ELIZABETH BYRNE HOGAN; City of St. Louis

Order for Continuance

was granted. So Ordered: Elizabeth B. Hogan, Judge

Hearing/Trial Cancelled

Associated Entries: 07/05/2023 - Jury Trial Scheduled

Scheduled For: 08/14/2023; 9:00 AM; SCOTT ANTHONY MILLIKAN; City of St. Louis

Exhibit

A

Above styled cause transferred to Division 1. Plaintiff's counsel to contact Division 1 to request continuance or new trial setting. So Ordered: Judge Scott A. Millikan

Judge Assigned

08/15/2023

Other Proposed Document Filed

First Amended Petition.

Filed By: MATTHEW JOHN GHIO

On Behalf Of: SOPHIA VASSER

Mot for Leave to File Out/Time

Motion for Leave to File FAP.

Filed By: MATTHEW JOHN GHIO

On Behalf Of: SOPHIA VASSER

07/05/2023

Ord Transfer P/Judge for Assn

Cause assigned to Division # 09 for trial on 08/14/23. see court order So Ordered: Elizabeth B. Hogan, Judge

Jury Trial Scheduled

Associated Entries: 08/28/2023 - Hearing/Trial Cancelled

Scheduled For: 08/14/2023; 9:00 AM; SCOTT ANTHONY MILLIKAN; City of St. Louis

Hearing/Trial Cancelled

Associated Entries: 06/27/2023 - Hearing Continued/Rescheduled

Associated Entries: 06/27/2023 - Jury Trial Scheduled

Scheduled For: 08/14/2023; 9:00 AM; ELIZABETH BYRNE HOGAN; City of St. Louis

Judge Assigned

06/27/2023

Jury Trial Scheduled

Associated Entries: 07/05/2023 - Hearing/Trial Cancelled

Scheduled For: 08/14/2023; 9:00 AM; ELIZABETH BYRNE HOGAN; City of St. Louis

Hearing Continued/Rescheduled

Associated Entries: 05/03/2023 - Hearing Continued/Rescheduled

Associated Entries: 05/03/2023 - Jury Trial Scheduled

Associated Entries: 07/05/2023 - Hearing/Trial Cancelled

Hearing Continued From: 07/03/2023; 9:00 AM Jury Trial

05/03/2023

Jury Trial Scheduled

Associated Entries: 06/27/2023 - Hearing Continued/Rescheduled

Scheduled For: 07/03/2023; 9:00 AM; ELIZABETH BYRNE HOGAN; City of St. Louis

Hearing Continued/Rescheduled

Associated Entries: 03/22/2023 - Hearing Continued/Rescheduled

Associated Entries: 03/22/2023 - Jury Trial Scheduled

Associated Entries: 06/27/2023 - Hearing Continued/Rescheduled

Hearing Continued From: 05/15/2023; 9:00 AM Jury Trial

03/22/2023

Jury Trial Scheduled

Associated Entries: 05/03/2023 - Hearing Continued/Rescheduled

Scheduled For: 05/15/2023; 9:00 AM; ELIZABETH BYRNE HOGAN; City of St. Louis

Hearing Continued/Rescheduled

Associated Entries: 02/08/2023 - Hearing Continued/Rescheduled

Associated Entries: 02/08/2023 - Jury Trial Scheduled

Associated Entries: 05/03/2023 - Hearing Continued/Rescheduled

Hearing Continued From: 03/27/2023; 9:00 AM Jury Trial

02/08/2023

Jury Trial Scheduled

Associated Entries: 03/22/2023 - Hearing Continued/Rescheduled

Scheduled For: 03/27/2023; 9:00 AM; ELIZABETH BYRNE HOGAN; City of St. Louis

Hearing Continued/Rescheduled

Associated Entries: 12/28/2022 - Hearing Continued/Rescheduled

Associated Entries: 12/28/2022 - Jury Trial Scheduled

Associated Entries: 03/22/2023 - Hearing Continued/Rescheduled

Hearing Continued From: 02/14/2023; 9:00 AM Jury Trial

12/28/2022

Jury Trial Scheduled

Associated Entries: 02/08/2023 - Hearing Continued/Rescheduled

Scheduled For: 02/14/2023; 9:00 AM; ELIZABETH BYRNE HOGAN; City of St. Louis

Hearing Continued/Rescheduled

Associated Entries: 10/24/2022 - Hearing Continued/Rescheduled

Associated Entries: 10/24/2022 - Jury Trial Scheduled

Associated Entries: 02/08/2023 - Hearing Continued/Rescheduled

Hearing Continued From: 01/03/2023; 9:00 AM Jury Trial

10/24/2022

Jury Trial Scheduled

Associated Entries: 12/28/2022 - Hearing Continued/Rescheduled

Scheduled For: 01/03/2023; 9:00 AM; MICHAEL FRANCIS STELZER; City of St. Louis

Hearing Continued/Rescheduled

Associated Entries: 08/31/2022 - Hearing Continued/Rescheduled

Associated Entries: 08/31/2022 - Jury Trial Scheduled

Associated Entries: 12/28/2022 - Hearing Continued/Rescheduled

Hearing Continued From: 10/24/2022; 9:00 AM Jury Trial

08/31/2022

Jury Trial Scheduled

Associated Entries: 10/24/2022 - Hearing Continued/Rescheduled

Scheduled For: 10/24/2022; 9:00 AM; MICHAEL FRANCIS STELZER; City of St. Louis

Hearing Continued/Rescheduled

Associated Entries: 07/15/2022 - Hearing Continued/Rescheduled

Associated Entries: 07/15/2022 - Jury Trial Scheduled

Associated Entries: 10/24/2022 - Hearing Continued/Rescheduled

Hearing Continued From: 09/06/2022; 9:00 AM Jury Trial

07/15/2022

Jury Trial Scheduled

Associated Entries: 08/31/2022 - Hearing Continued/Rescheduled

Scheduled For: 09/06/2022; 9:00 AM; MICHAEL FRANCIS STELZER; City of St. Louis

Hearing Continued/Rescheduled

Associated Entries: 06/01/2022 - Hearing Continued/Rescheduled

Associated Entries: 06/01/2022 - Jury Trial Scheduled

Associated Entries: 08/31/2022 - Hearing Continued/Rescheduled

Hearing Continued From: 07/18/2022; 9:00 AM Jury Trial

06/01/2022

Jury Trial Scheduled

Associated Entries: 07/15/2022 - Hearing Continued/Rescheduled

Scheduled For: 07/18/2022; 9:00 AM; MICHAEL FRANCIS STELZER; City of St. Louis

Hearing Continued/Rescheduled

Associated Entries: 04/13/2022 - Hearing Continued/Rescheduled

Associated Entries: 04/13/2022 - Jury Trial Scheduled

Associated Entries: 07/15/2022 - Hearing Continued/Rescheduled

Hearing Continued From: 06/06/2022; 9:00 AM Jury Trial

04/13/2022

Jury Trial Scheduled

Associated Entries: 06/01/2022 - Hearing Continued/Rescheduled

Scheduled For: 06/06/2022; 9:00 AM; MICHAEL FRANCIS STELZER; City of St. Louis

Hearing Continued/Rescheduled

Associated Entries: 02/23/2022 - Hearing Continued/Rescheduled

Associated Entries: 02/23/2022 - Jury Trial Scheduled

Associated Entries: 06/01/2022 - Hearing Continued/Rescheduled

Hearing Continued From: 04/18/2022; 9:00 AM Jury Trial

02/23/2022

Jury Trial Scheduled

Associated Entries: 01/27/2022 - Hearing Continued/Rescheduled

Scheduled For: 04/18/2022; 9:00 AM; MICHAEL FRANCIS STELZER; City of St. Louis

Hearing Continued/Rescheduled

Associated Entries: 01/07/2022 - Hearing Continued/Rescheduled

Associated Entries: 01/07/2022 - Jury Trial Scheduled

Associated Entries: 04/13/2022 - Hearing Continued/Rescheduled

Hearing Continued From: 02/28/2022; 9:00 AM Jury Trial

01/07/2022

Jury Trial Scheduled

Associated Entries: 02/23/2022 - Hearing Continued/Rescheduled

Scheduled For: 02/28/2022; 9:00 AM; MICHAEL FRANCIS STELZER; City of St. Louis

Hearing Continued/Rescheduled

Associated Entries: 10/28/2021 - Hearing Continued/Rescheduled

Associated Entries: 10/28/2021 - Jury Trial Scheduled

Associated Entries: 02/23/2022 - Hearing Continued/Rescheduled

Hearing Continued From: 01/18/2022; 9:00 AM Jury Trial

10/28/2021

Jury Trial Scheduled

Associated Entries: 01/07/2022 - Hearing Continued/Rescheduled

Scheduled For: 01/18/2022; 9:00 AM; MICHAEL FRANCIS STELZER; City of St. Louis

Hearing Continued/Rescheduled

Associated Entries: 08/18/2021 - Hearing Continued/Rescheduled

Associated Entries: 08/18/2021 - Jury Trial Scheduled

Associated Entries: 01/07/2022 - Hearing Continued/Rescheduled

Hearing Continued From: 11/08/2021; 9:00 AM Jury Trial

08/18/2021

Jury Trial Scheduled

Associated Entries: 10/28/2021 - Hearing Continued/Rescheduled

Scheduled For: 11/08/2021; 9:00 AM; MICHAEL FRANCIS STELZER; City of St. Louis

Hearing Continued/Rescheduled

Associated Entries: 06/23/2021 - Hearing Continued/Rescheduled

Associated Entries: 06/23/2021 - Jury Trial Scheduled

Associated Entries: 10/28/2021 - Hearing Continued/Rescheduled

Hearing Continued From: 09/27/2021; 9:00 AM Jury Trial

06/23/2021

Jury Trial Scheduled

Associated Entries: 08/18/2021 - Hearing Continued/Rescheduled

Scheduled For: 09/27/2021; 9:00 AM; MICHAEL FRANCIS STELZER; City of St. Louis

Hearing Continued/Rescheduled

Associated Entries: 05/10/2021 - Hearing Continued/Rescheduled

Associated Entries: 05/10/2021 - Jury Trial Scheduled

Associated Entries: 08/18/2021 - Hearing Continued/Rescheduled

Hearing Continued From: 08/02/2021; 9:00 AM Jury Trial

05/10/2021

Jury Trial Scheduled

Associated Entries: 06/23/2021 - Hearing Continued/Rescheduled

Scheduled For: 08/02/2021; 9:00 AM; MICHAEL FRANCIS STELZER; City of St. Louis

Hearing Continued/Rescheduled

Associated Entries: 04/21/2021 - Hearing Continued/Rescheduled

Associated Entries: 04/21/2021 - Jury Trial Scheduled

Associated Entries: 06/23/2021 - Hearing Continued/Rescheduled

Hearing Continued From: 06/21/2021; 9:00 AM Jury Trial

04/21/2021

Jury Trial Scheduled

Associated Entries: 05/10/2021 - Hearing Continued/Rescheduled

Scheduled For: 06/21/2021; 9:00 AM; MICHAEL FRANCIS STELZER; City of St. Louis

Associated Entries: 03/03/2021 - Hearing Continued/Rescheduled
Associated Entries: 05/10/2021 - Hearing Continued/Rescheduled
Hearing Continued From: 05/03/2021; 9:00 AM Jury Trial

03/03/2021

Jury Trial Scheduled

Associated Entries: 04/21/2021 - Hearing Continued/Rescheduled
Scheduled For: 05/03/2021; 9:00 AM; MICHAEL FRANCIS STELZER; City of St. Louis

Hearing Continued/Rescheduled

Associated Entries: 01/13/2021 - Hearing Continued/Rescheduled
Associated Entries: 01/13/2021 - Jury Trial Scheduled
Associated Entries: 04/21/2021 - Hearing Continued/Rescheduled
Hearing Continued From: 03/15/2021; 9:00 AM Jury Trial

01/13/2021

Jury Trial Scheduled

Associated Entries: 03/03/2021 - Hearing Continued/Rescheduled
Scheduled For: 03/15/2021; 9:00 AM; MICHAEL FRANCIS STELZER; City of St. Louis

Hearing Continued/Rescheduled

Associated Entries: 12/01/2020 - Hearing Continued/Rescheduled
Associated Entries: 12/01/2020 - Jury Trial Scheduled
Associated Entries: 03/03/2021 - Hearing Continued/Rescheduled
Hearing Continued From: 02/01/2021; 9:00 AM Jury Trial

12/01/2020

Jury Trial Scheduled

Associated Entries: 01/13/2021 - Hearing Continued/Rescheduled
Scheduled For: 02/01/2021; 9:00 AM; MICHAEL FRANCIS STELZER; City of St. Louis

Hearing Continued/Rescheduled

Associated Entries: 10/05/2020 - Hearing Continued/Rescheduled
Associated Entries: 10/05/2020 - Jury Trial Scheduled
Associated Entries: 01/13/2021 - Hearing Continued/Rescheduled
Hearing Continued From: 12/07/2020; 9:00 AM Jury Trial

10/05/2020

Jury Trial Scheduled

Associated Entries: 12/01/2020 - Hearing Continued/Rescheduled
Scheduled For: 12/07/2020; 9:00 AM; REX M BURLISON; City of St. Louis

Hearing Continued/Rescheduled

Associated Entries: 08/24/2020 - Hearing Continued/Rescheduled
Associated Entries: 08/24/2020 - Jury Trial Scheduled
Associated Entries: 12/01/2020 - Hearing Continued/Rescheduled
Hearing Continued From: 10/13/2020; 9:00 AM Jury Trial

08/24/2020

Jury Trial Scheduled

Associated Entries: 10/05/2020 - Hearing Continued/Rescheduled
Scheduled For: 10/13/2020; 9:00 AM; REX M BURLISON; City of St. Louis

Hearing Continued/Rescheduled

Associated Entries: 02/19/2020 - Jury Trial Scheduled
Associated Entries: 10/05/2020 - Hearing Continued/Rescheduled
Hearing Continued From: 08/24/2020; 9:00 AM Jury Trial

02/19/2020

Jury Trial Scheduled

Associated Entries: 08/24/2020 - Hearing Continued/Rescheduled
Scheduled For: 08/24/2020; 9:00 AM; REX M BURLISON; City of St. Louis

02/11/2020

Summons Issued-Circuit

Document ID: 20-SMCC-846, for WASHINGTON UNIVERSITY IN ST. LOUIS.

02/10/2020

Filing Info Sheet eFiling

Filed By: MATTHEW JOHN GHIO

Note to Clerk eFiling

Case 4:23-mv-01741-JSG Doc. #: 1-1 Filed: 10/10/23 Page: 6 of 33 PageID #: 10

Pet Filed in Circuit Ct

Petition.

Filed By: MATTHEW JOHN GHIO

On Behalf Of: SOPHIA VASSER

Judge Assigned

MISSOURI CIRCUIT COURT
 TWENTY-SECOND JUDICIAL CIRCUIT
 (City of St. Louis)

SOPHIA VASSER,

Plaintiff,

vs.

WASHINGTON UNIVERSITY
 IN ST. LOUIS,

SERVE AT:

Monica J. Allen

Vice-Chancellor and General Counsel

One Brookings Drive

St. Louis, Missouri 63130

Defendant.

Case No. _____

Division No. _____

PETITION
EMPLOYMENT DISCRIMINATION UNDER THE MISSOURI HUMAN
RIGHTS ACT

COMES NOW Plaintiff, by and through counsel, and for her Petition, states as follows:

1. Plaintiff Sophia Vasser is an African-American citizen of the United States who lives in St. Louis, Missouri.
2. Defendant Washington University in St. Louis is a Missouri domestic corporation, registered in Missouri and doing business in St. Louis City as Washington University in St. Louis.
3. Plaintiff was first employed by Defendant Washington University's School

of Medicine in 1999 as a medical secretary and in billing, and worked for Defendant until August, 2016.

4. Material events and transactions underlying Plaintiff's claims occurred within the City of St. Louis, State of Missouri.

5. This Court maintains venue and jurisdiction over Plaintiffs claims brought herein pursuant to R.S. Mo. Sec. 213.111.

COUNT I — RACE DISCRIMINATION
IN VIOLATION OF THE MISSOURI HUMAN RIGHTS ACT

6. Plaintiff incorporates and re-alleges all allegations contained within paragraphs 1 through 5 above as if fully set forth herein.

7. Defendant is an "employer" within the meaning of R.S.Mo. Sec. 213.010.

8. Plaintiff filed a timely charge with the Missouri Commission on Human Rights ("MCHR"), alleging race discrimination and retaliation.

9. On November 12, 2019, the MCHR issued Plaintiff a Notice of Right to Sue and Plaintiff thereafter filed this suit in a timely manner on February 10, 2020.

10. Plaintiff reapplied for a position with Defendant in the summer of 2017.

11. Plaintiff was hired as a scheduler on July 17, 2017.

12. During 2017, Jennifer Grelle, a white female co-worker of mine, called a patient a "bitch" on a scheduling call. Grelle was not disciplined or written up by our supervisor, Lorinda Gaines. Grelle was then allowed to transfer to another department.

13. On July 17, 2018, Plaintiff received her first performance review which was

a good one.

14. Around November 16, 2018, Plaintiff took a scheduling call for a patient who needed help with a cast.

15. On November 19, 2018, Plaintiff was called into a meeting with Gaines and Kathy Bradley. They accused Plaintiff of calling the patient a “bitch” on a recorded call. Plaintiff did not call the patient that name. Plaintiff listened to the recording and did not hear herself use that word.

16. Gaines and Bradley said Plaintiff did use that word, and they fired her on the spot.

17. Plaintiff complained internally to Defendant that she did not use that word and about how she was being discriminated against by being treated differently than Jennifer Grelle even if it were true that she said the word.

18. Defendant discriminated against Plaintiff because of her race when it treated her differently than a white co-worker by terminating her employment and Plaintiff's race was a motivating factor in the decision to discharge her.

19. Defendant's conduct, as aforesaid, constitutes an unlawful employment practice under R.S.Mo. Sec. 213.055(1).

20. As a direct result of Defendant's unlawful employment practices, Plaintiff has been damaged in the form of diminished employment status, out-of-pocket costs and expenses, emotional distress and humiliation.

21. Defendants' actions were intentional, willful, knowing, wanton and malicious, and in flagrant disregard for the rights of Plaintiff, and entitle Plaintiff to an award of punitive damages.

22. Plaintiff demands a trial by jury on this Count I of her Petition.

WHEREFORE, on Count 1 of this Petition, Plaintiff prays this Court to enter its order, judgment and decree awarding her:

- a) a sum of money making Plaintiff whole for the harm caused, including compensatory damages and damages for emotional distress and humiliation;
- b) reinstatement to her former position with Defendant or front pay in the alternative;
- c) punitive damages to punish and deter Defendants and others from like conduct;
- d) costs of litigation and a reasonable sum as and for attorney's fees;
- e) pre-judgment interest; and
- f) such other and further relief as this Court deems just and proper.

**COUNT II: RETALIATION IN VIOLATION OF THE
MISSOURI HUMAN RIGHTS ACT**

23. Plaintiff re-alleges and incorporates by reference each and every allegation contained in paragraphs 1 through 17 above as if fully set forth herein.

24. Plaintiff's complaint of discrimination after her discharge that she was being discriminated against because of her race was a motivating factor in why her internal appeal failed to result in her reinstatement to her position.

25. Such actions constitute unlawful employment practices under R.S.Mo. § 213.055(1) and R.S.Mo. § 213.070(2) because of Plaintiff's opposition to a practice she reasonably believed to be unlawful.

26. As a direct result of Defendants' unlawful employment practices, Plaintiff has been damaged in the form of lost wages and benefits, diminished employment status, out-of-pocket costs and expenses, emotional distress, anxiety and humiliation.

27. Defendants' actions were outrageous because of Defendants' evil motive or reckless indifference to the rights of others, and therefore entitle Plaintiff to an award of punitive damages.

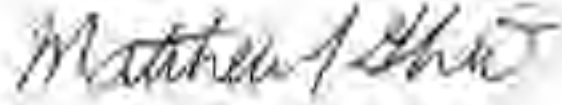
28. Plaintiff demands a trial by jury on this Count II of her Petition.

WHEREFORE, on Count II of her Petition, Plaintiff prays this Court enter its order, judgment and decree awarding her:

- a) a sum of money making Plaintiff whole for the harm caused, including compensatory damages and damages for emotional distress and humiliation;
- b) reinstatement to her former position with Defendant or front pay in the alternative;
- c) punitive damages to punish and deter Defendants and others from like conduct;
- d) costs of litigation and a reasonable sum as and for attorney's fees;
- e) pre-judgment interest; and
- f) such other and further relief as this Court deems just and proper.

Respectfully submitted,

GHIO LAW FIRM LLC

A handwritten signature in dark ink, appearing to read "Matthew J. Ghio", is positioned above the typed name.

By: _____

Matthew J. Ghio #44799

In the Historic Dickmann Building

3115 S. Grand, Suite 100

St. Louis, Missouri 63118

(314) 707-5853


(314) 732-1404 (fax)

matt@ghioemploymentlaw.com



Judge or Division: REX M BURLISON	Case Number: 2022-CC00303	Special Process Server 1
Plaintiff/Petitioner: SOPHIA VASSER	Plaintiff's/Petitioner's Attorney/Address MATTHEW JOHN GHIO GHIO LAW FIRM LLC 3115 S GRAND, SUITE 100 ST LOUIS, MO 63118	Special Process Server 2
vs.		Special Process Server 3
Defendant/Respondent: WASHINGTON UNIVERSITY IN ST. LOUIS	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	
Nature of Suit: CC Employmnt Discrmntn 213.111		(Date File Stamp)

Summons in Civil Case

The State of Missouri to: WASHINGTON UNIVERSITY IN ST. LOUIS	
Alias: MONICA J ALLEN VICE-CHANCELLOR & GEN COUNSELOR 1 BROOKINGS DRIVE SAINT LOUIS, MO 63130	SHERIFF'S FEE PAID
 CITY OF ST LOUIS	<p>You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.</p> <p style="text-align: center;">February 11, 2020</p> <p style="text-align: right;"><i>Thomas Hoepfinger</i></p> <p style="text-align: center;">Date Clerk</p>
Further Information:	

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within 30 days after the date of issue.

I certify that I have served the above summons by: (check one)

- ☐ delivering a copy of the summons and a copy of the petition to the defendant/respondent.
- ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with _____, a person of the defendant's/respondent's family over the age of 15 years who permanently resides with the defendant/respondent.
- ☐ (for service on a corporation) delivering a copy of the summons and a copy of the complaint to: _____ (name) _____ (title).
- ☐ other: _____.

Served at _____ (address)
in _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on _____ (date).

(Seal)

My commission expires: _____

Date

Notary Public

Sheriff's Fees, if applicable

Summons	\$ _____
Non Est	\$ _____
Sheriff's Deputy Salary	
Supplemental Surcharge	\$ 10.00
Mileage	\$ _____ (_____ miles @ \$._____ per mile)
Total	\$ _____

A copy of the summons and a copy of the petition must be served on **each** defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

FILED

JUL - 5 2023

**MISSOURI CIRCUIT COURT
TWENTY – SECOND JUDICIAL CIRCUIT
(CITY OF ST. LOUIS)**

22ND JUDICIAL CIRCUIT
CIRCUIT CLERK'S OFFICE
DEPUTY

Vasser
Plaintiff

Vs.

Cause No. 2022-CC-00303

Wash A
Defendant,

Division No. 1

COURT ORDER

Cause assigned to Judge M. H. Kan, Division 9
for civil trial on 8-14-23, at 9:00 a.m.

Plaintiff shall notify all Defendants of the trial setting and file certificate of service with the Court.

Application for continuances of the trial setting must be presented in person to the Presiding Judge in Division One.

All other Pre-Trial Motions are governed by the provision of Local Rule 33.7 as amended.

SO ORDERD:

E. B. Hogan
Elizabeth B. Hogan
Presiding Judge

Dated: 5, July '23

5. This Court maintains venue and jurisdiction over Plaintiffs claims brought herein pursuant to R.S. Mo. Sec. 213.111, and [MO Const art V § 14](#).

COUNT I — RACE DISCRIMINATION
IN VIOLATION OF THE MISSOURI HUMAN RIGHTS ACT

6. Plaintiff incorporates and re-alleges all allegations contained within paragraphs 1 through 5 above as if fully set forth herein.

7. Defendant is an "employer" within the meaning of R.S.Mo. Sec. 213.010.

8. Plaintiff filed a timely charge with the Missouri Commission on Human Rights ("MCHR"), alleging race discrimination and retaliation.

9. On November 12, 2019, the MCHR issued Plaintiff a Notice of Right to Sue and Plaintiff thereafter filed this suit in a timely manner on February 10, 2020.

10. Plaintiff reapplied for a position with Defendant in the summer of 2017.

11. Plaintiff was hired as a scheduler on July 17, 2017.

12. During 2017, Jennifer Grelle, a white female co-worker of mine, called a patient a "bitch" on a scheduling call. Grelle was not disciplined or written up by our supervisor, Lorinda Gaines. Grelle was then allowed to transfer to another department.

13. On July 17, 2018, Plaintiff received her first performance review which was a good one.

14. Around November 16, 2018, Plaintiff took a scheduling call for a patient who needed help with a cast.

15. On November 19, 2018, Plaintiff was called into a meeting with Gaines and Kathy Bradley. They accused Plaintiff of calling the patient a "bitch" on a recorded call.

Plaintiff did not call the patient that name. Plaintiff listened to the recording and did not hear herself use that word.

16. Gaines and Bradley said Plaintiff did use that word, and they fired her on the spot.

17. Plaintiff complained internally to Defendant that she did not use that word and about how she was being discriminated against by being treated differently than Jennifer Grelle even if it were true that she said the word.

18. Defendant discriminated against Plaintiff because of her race when it treated her differently than a white co-worker by terminating her employment and Plaintiff's race was a motivating factor in the decision to discharge her.

19. Defendant's conduct, as aforesaid, constitutes an unlawful employment practice under R.S.Mo. Sec. 213.055(1).

20. As a direct result of Defendant's unlawful employment practices, Plaintiff has been damaged in the form of diminished employment status, out-of-pocket costs and expenses, emotional distress and humiliation.

21. Defendants' actions were intentional, willful, knowing, wanton and malicious, and in flagrant disregard for the rights of Plaintiff, and entitle Plaintiff to an award of punitive damages.

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- a) a sum of money making Plaintiff whole for the harm caused, including compensatory damages and damages for emotional distress and humiliation;
- b) reinstatement to her former position with Defendant or front pay in the alternative;
- c) punitive damages to punish and deter Defendants and others from like conduct;
- d) costs of litigation and a reasonable sum as and for attorney's fees;
- e) pre-judgment interest; and
- f) such other and further relief as this Court deems just and proper.

**COUNT II: RETALIATION IN VIOLATION OF THE
MISSOURI HUMAN RIGHTS ACT**

23. Plaintiff re-alleges and incorporates by reference each and every allegation contained in paragraphs 1 through 17 above as if fully set forth herein.

24. Plaintiff's complaint of discrimination after her discharge that she was being discriminated against because of her race was a motivating factor in why her internal appeal failed to result in her reinstatement to her position.

25. Such actions constitute unlawful employment practices under R.S.Mo. § 213.055(1) and R.S.Mo. § 213.070(2) because of Plaintiff's opposition to a practice she reasonably believed to be unlawful.

26. As a direct result of Defendants' unlawful employment practices, Plaintiff has been damaged in the form of lost wages and benefits, diminished employment status, out-of-pocket costs and expenses, emotional distress, anxiety and humiliation.

27. Defendants' actions were outrageous because of Defendants' evil motive or

reckless indifference to the rights of others, and therefore entitle Plaintiff to an award of punitive damages.

28. Plaintiff demands a trial by jury on this Count II of her Petition.

WHEREFORE, on Count II of her Petition, Plaintiff prays this Court enter its order, judgment and decree awarding her:

- a) a sum of money making Plaintiff whole for the harm caused, including compensatory damages and damages for emotional distress and humiliation;
- b) reinstatement to her former position with Defendant or front pay in the alternative;
- c) punitive damages to punish and deter Defendants and others from like conduct;
- d) costs of litigation and a reasonable sum as and for attorney's fees;
- e) pre-judgment interest; and
- f) such other and further relief as this Court deems just and proper.

COUNT III: SECTION 1981 - DISCRIMINATION AND RETALIATION ON THE BASIS OF RACE

29. This claim arises under 42 U.S.C. § 1981 ("Section 1981"). Jurisdiction of this Court is invoked pursuant to [MO Const art V § 14](#).

30. Ms. Vasser realleges the foregoing paragraphs as though fully set forth herein.

31. Ms. Vasser is a member of a protected class on the basis of race. She is an African-American woman.

32. Ms. Vasser, in all respects, was performing her job in a manner that was

consistent with Washington University's legitimate business expectations.

33. Washington University discriminated against Ms. Vasser as described above, including but not limited to, firing her.

34. Washington University also retaliated against Ms. Vasser as described above, including but not limited to firing her because of her complaint of race discrimination.

35. Washington University's actions were taken with a willful and wanton disregard of Ms. Vasser's rights under Section 1981.

36. As a direct and proximate result of said unlawful employment practices and in disregard of Ms. Vasser's rights and sensibilities, Ms. Vasser has suffered humiliation, degradation, emotional distress, other consequential damages, and lost wages.

WHEREFORE, on Count III of her Petition, Plaintiff prays this Court enter its order, judgment and decree awarding her:

A. Enter judgment in favor of Ms. Vasser and against the Defendant for violation of Ms. Vasser's Rights under Section 1981;

B. Declare that the actions of the Defendant constituted unlawful discrimination;

C. Award Ms. Vasser compensatory damages, including, but not limited to, lost wages and benefits, in such amount as will reasonably compensate her for her losses, and damages for emotional distress;

D. Award Ms. Vasser punitive damages in such amount as the Court deems proper;

E. Award Ms. Vasser her costs, attorneys' fees, and non-taxable expenses in this

action; and

F. Grant Ms. Vasser such other and further relief as the Court deems equitable and just.

Respectfully submitted,

GHIO LAW FIRM LLC



By: _____
Matthew J. Ghio #44799
In the Historic Dickmann Building
3115 S. Grand, Suite 100
St. Louis, Missouri 63118
(314) 707-5853
(314) 732-1404 (fax)
matt@ghioemploymentlaw.com

FILED
AUG 28 2023

MISSOURI CIRCUIT COURT
TWENTY-SECOND JUDICIAL CIRCUIT
(CITY OF ST. LOUIS)
22ND JUDICIAL CIRCUIT
CIRCUIT CLERK'S OFFICE
DEPUTY

SOPHIA VASSEL
VS

WASHINGTON UNIVERSITY IN ST. LOUIS

CASE NO. 2022-CC00303 DIVISION 9 August 28 2023

ORDER/JUDGMENT/MEMORANDUM

ABOVE STYLED CAUSE TRANSFERRED TO
DIVISION 1.

PLAINTIFF'S COUNSEL TO CONTACT DIVISION 1
TO REQUEST CONTINUANCE OR NEW TRIAL
SETTING.

SO ORDERED:

[Signature] DLG

ENTERED

AUG 28 2023

OLG

FILED

AUG 28 2023

22ND JUDICIAL CIRCUIT
CIRCUIT CLERK'S OFFICE
BY _____ DEPUTY

MISSOURI CIRCUIT COURT
TWENTY - SECOND JUDICIAL CIRCUIT
(CITY OF ST. LOUIS)

Sophia Vassev

VS

Washington U. in St. Louis

CAUSE NO. 2022-CC00303 DIV. 9 DATE August 28

COURT ORDER

Case set on rolling trial docket &

~~Cause assigned to Honorable _____ in Division _____~~
~~for all further proceedings.~~

11/27/23 in Div 1

SO ORDERED:



Elizabeth B. Hogan
Presiding Judge

MISSOURI CIRCUIT COURT
TWENTY-SECOND JUDICIAL CIRCUIT
(City of St. Louis)

FILED
SEP - 6 2023
22ND JUDICIAL CIRCUIT
CIRCUIT CLERK'S OFFICE
BY _____ DEPUTY

SOPHIA VASSER,

Plaintiff,

vs.

WASHINGTON UNIVERSITY
IN ST. LOUIS,

Defendant.

Case No. Case No: 2022-CC00303

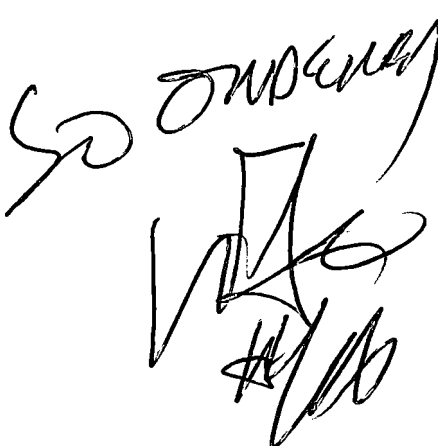
Division No. 9

MOTION FOR LEAVE TO FILE
FIRST AMENDED PETITION UNDER RULE 55.33(a)

Comes now Plaintiff, pursuant to Rule 55.33(a), and seeks leave of court to file
her First Amended Petition.

Respectfully submitted,

GHIO LAW FIRM LLC



By: _____
Matthew J. Ghio #44799
In the Historic Dickmann Building
3115 S. Grand, Suite 100
St. Louis, Missouri 63118
(314) 707-5853
(314) 732-1404 (fax)
matt@ghioemploymentlaw.com

ENTERED

SEP - 6 2023

MS

In the
CIRCUIT COURT
City of St. Louis, Missouri



For File Stamp Only

Sophia Vasser
Plaintiff/Petitioner

September 6, 2023
Date

vs.

Washington University St. Louis
Defendant/Respondent

2022-CC00303
Case number
1
Division

REQUEST FOR PPOINTMENT OF PROCESS SERVER

Comes now Plaintiff Sophia Vasser, pursuant
Requesting Party

to Local Rule 14, requests the appointment by the Circuit Clerk of
Wm. Stage PO Box 4932 St Louis Mo 63108 314-420-2226

Name of Process Server address Telephone

Name of Process Server address Telephone

Name of Process Server address Telephone

to serve the summons and petition in this cause on the below named parties.

SERVE:
Monica J. Allen, General Counsel
Name
Washington University in St. Louis
address
One Brookings Drive St Louis Mo 63130
City/State/Zip

SERVE:
Name
address
City/State/Zip

ppointed as requested:
TOM KLOEPPINGER, Circuit Clerk

By
Deputy Clerk

Date

SERVE:
Name
address
City/State/Zip

SERVE:
Name
address
City/State/Zip

Matthew J. Ghio
ttorney/Plaintiff/Petitioner
44799
Bar No.
3115 S Grand, Suite 100. St Louis Mo 63118
address
314-707-5853
Phone No.

RULE 14 SPECIAL PROCESS SERVERS

1. Any person appointed by the Court or the Circuit Clerk to serve process must have a license issued pursuant to this rule to serve process.
2. Licenses to serve process shall be issued by the Sheriff of the City of St. Louis if the applicant has met the following qualifications:
 - a. Is twenty-one years of age or older;
 - b. Has a high school diploma or an equivalent level of education;
 - c. Has insurance coverage for any errors or omissions occurring in the service of process;
 - d. Has not been convicted, pleaded guilty to or been found guilty of any felony, or of any misdemeanor involving moral turpitude; and,
 - e. Has passed a training course for the service of process which shall be administered by the Sheriff of the City of St. Louis.
3. Each applicant for a process server license under the provisions of this rule shall provide an affidavit setting forth such person's legal name, current address, any other occupations and current telephone numbers. Licensed process servers shall immediately notify the Sheriff of the City of St. Louis of any change in the above information, and the failure to do so shall constitute good cause for the revocation of such person's license.
4. The Sheriff of the City of St. Louis shall maintain a list of persons licensed to serve process pursuant to this rule, and shall make such list available to litigants upon request.
5. A photo identification card designed by the Sheriff of the City of St. Louis shall be issued in addition to the license. No other identification will be allowed. All licenses must be signed and approved by the Sheriff of the City of St. Louis and the Presiding Judge or his designee.
6. A license fee recommended by the Sheriff and approved by the Court En Banc shall be charged to cover the costs of compiling and maintaining the list of process servers and for the training of such process servers. The license fees shall be made payable to the Sheriff of the City of St. Louis.

7. license for service of process issued under this rule may be revoked by the Sheriff with the approval of the Presiding Judge or his designee, for any of the following reasons:

- a. Misrepresentation of duty or authority;
- b. Conviction, guilty plea or finding of guilty of any state or federal felony, or a misdemeanor involving moral turpitude;
- c. Improper use of the license;
- d. Making a false return; or
- e. ny other good cause.

Provided, no service of process made by an appointed process server with a revoked license shall be void if the Court or Circuit Clerk made the appointment in good faith without knowledge of the license revocation.

8. ny person authorized to serve process may carry a concealed firearm as allowed by Section 506.145, RSMo, only while actually engaged in the service of process and only if the person has passed a firearms qualification test approved by a law enforcement agency; provided, however, that any licensed special process server may file a written waiver of the right to carry a concealed firearm and thereby avoid the requirements of firearm training and testing. ny violation of this section shall be considered beyond the scope of the privilege to carry a concealed weapon that is granted by the appointment, and shall constitute good cause for the revocation of the license.

9. pplications for the appointment of a special process server shall be made on forms available in the offices of the Sheriff and Circuit Clerk. Orders ppointing special process servers may list more than one licensed server as alternatives.

10. The licenses granted pursuant to this rule shall be good for two years. Each person granted a license shall be required to reapply at the expiration of the license and shall be required to provide all the information required in the initial application, including a current police record check.

(pproved 9/28/92; amended 11/23/92; 5/31/95; 12/17/07)



IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI

Judge or Division: ELIZABETH BYRNE HOGAN	Case Number: 2022-CC00303	
Plaintiff/Petitioner: SOPHIA VASSER	Plaintiff's/Petitioner's Attorney/Address MATTHEW JOHN GHIO GHIO LAW FIRM LLC 3115 S GRAND, SUITE 100 ST LOUIS, MO 63118	
Defendant/Respondent: WASHINGTON UNIVERSITY IN ST. LOUIS	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	
Nature of Suit: CC Employmnt Discrmntn 213.111		(Date File Stamp)

ALIAS Summons in Civil Case

The State of Missouri to: WASHINGTON UNIVERSITY IN ST. LOUIS

Alias:

MONICA J ALLEN, VICE CHANCELLOR
GENERAL COUNSEL
WASHINGTON UNIVERSITY IN STL
CAMPUS BOX 1058,
ONE BROOKINGS DRIVE
SAINT LOUIS, MO 63130

SPECIAL PROCESS SERVER

COURT SEAL OF



CITY OF ST LOUIS

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

September 8, 2023

Date

Circuit Clerk

Further Information:

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within 30 days after the date of issue.

I certify that I have served the above Summons by: (check one)

- ☐ delivering a copy of the summons and petition to the defendant/respondent.
☐ leaving a copy of the summons and petition at the dwelling house or usual place of abode of the defendant/respondent with _____, a person at least 18 years of age residing therein.
☐ (for service on a corporation) delivering a copy of the summons and petition to: _____ (name) _____ (title).
☐ other: _____

Served at _____ (address)
 in _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on _____ (date).

(Seal)

My commission expires: _____

Date

Notary Public

Sheriff's Fees, if applicable

Summons \$ _____
 Non Est \$ _____
 Sheriff's Deputy Salary
 Supplemental Surcharge \$ 10.00
 Mileage \$ _____ (_____ miles @ \$._____ per mile)
Total \$ _____

A copy of the summons and petition must be served on **each** defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

FILED

MISSOURI CIRCUIT COURT
TWENTY – SECOND JUDICIAL CIRCUIT
(CITY OF ST. LOUIS)

SEP 21 2023

2023 JUDICIAL CIRCUIT
CIRCUIT CLERK'S OFFICE
BY _____ DEPUTY

Asser
Plaintiff

Vs.

Cause No. 2022-CL-00303

Division No. 1

Wash. H.
Defendant,

COURT ORDER

Cause assigned to Judge *Wright*, Division 2
for civil trial on 11-27-23, at 9:00 a.m.

Plaintiff shall notify all Defendants of the trial setting and file certificate of service with the Court.

Application for continuances of the trial setting must be presented in person to the Presiding Judge in Division One.

All other Pre-Trial Motions are governed by the provision of Local Rule 33.7 as amended.

SO ORDERD:

E. B. Hogan
Elizabeth B. Hogan
Presiding Judge

Dated: 21, Sept. '23